



January 5, 2018

VIA USPS PRIORITY MAIL

Mr. Todd Zynda, PE, Senior Environmental Engineer
Air Quality Division, Detroit Office
Michigan Department of Environmental Quality
3058 W. Grand Boulevard, Suite 2-300
Detroit, MI 48202-6058

Subject: Violation Notice dated December 18, 2017

Dear Mr. Zynda:

FCA US LLC ("FCA") acknowledges receipt of the violation notice from Michigan Department of Environmental Quality ("MDEQ") dated December 18, 2017 ("VN") issued to FCA's Mack Avenue Engine Plant ("MAEP"). This letter, serves as FCA's response to the VN. In short, the permit condition cited in the VN is the result of an administrative permitting error. FCA corrected the error in an application for a permit to install ("PTI") and is submitting the application to MDEQ. A copy of the application is included with this letter.

During your inspection on October 30, 2017, you observed that the actual stack dimensions for the stack serving MAEP's two hot test stands were not the same as the dimensions listed in MAEP's Renewable Operating Permit M4085-2015a ("ROP"). The discrepancy in the dimensions was a result of an administrative error during the issuance of PTI #261-99B and the incorporation of PTI #261-99B into the ROP. As a result, the higher stack height (50 feet) ended up in the ROP. FCA confirmed that the existing stack is actually thirty-five (35) feet tall and has an inside diameter of six (6) inches.

The stack that you observed serves the two hot test stands that existed and were permitted (along with the existing stack) prior to 2003 (prior to MDEQ's issuance of PTI #261-99B on July 2013). Prior to PTI #261-99B, no stack dimensions were specified by permit. As you will remember, FCA applied for and obtained a PTI for an additional six (6) hot test stands, for which stack dimensions were provided. MDEQ issued PTI #261-99B for these units, which specified dimensions for the stacks serving the new units but did not list the height of the stack that would continue to serve the two existing hot test stands.

The six new units authorized by PTI #261-99B were never installed and thus could not be included in the ROP application. Operating limitations from PTI #261-99B, including the fuel usage limit, were correctly incorporated into the ROP. However, the dimensions of the stack for the uninstalled hot test stands were inadvertently incorporated into the ROP. Instead, the dimensions of the existing stack serving the two existing hot test stands



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should have been incorporated into the ROP. In other words, during the development of the ROP incorporating PTI #261-99B, the stack dimensions for the six uninstalled hot test stands were transposed to the existing two hot test stands for which dimensions have never been specified by permit. See page 5 of 13 of the PTI #261-99B and page 4 of 5 the attached PTI #261-99A.

FCA is submitting a PTI application for the replacement of the existing two hot test stands simultaneously with this response to the VN. With the PTI application, all the correct dimensions are provided and thus the ROP may be revised to reflect the actual conditions at MAEP. It is also pertinent to mention that the lower stack height than indicated in the ROP did not result in higher emissions from the units.

If you have any questions and/or comments about this letter, please do not hesitate to contact me, or Chukwuemeka Ben Bosah of our EHS Corporate Environment Group. I can be reached via email at tyree.minner@fcagroup.com or by telephone at 313-252-6599. Mr. Bosah can be reached by email at chukwuemeka.bosah@fcagroup.com or by telephone at 248-512-4232. Thank you for your help resolving this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tyree Minner', is written over a thin horizontal line.

Tyree Minner
Plant Manager
FCA US LLC – Mack Avenue Engine Plant
4000 St Jean
Detroit, MI 48214

Enclosures

cc: Chukwuemeka Ben Bosah, FCA US LLC, EHS Corporate Environment Group
Keith D. Jones, Mack Avenue Engine Plant, FCA US LLC
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